

1 JOHN K. VAN DE KAMP, Attorney General
of the State of California
2 ALAN S. METH, Deputy Attorney General
110 West A Street, Suite 700
3 San Diego, California 92101
Telephone: (619) 237-7224

4 Attorneys for Complainant
5
6
7

BEFORE THE
DIVISION OF MEDICAL QUALITY
BOARD OF MEDICAL QUALITY ASSURANCE
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

13 In the Matter of the Accusation) No. D-3459
Against:)
14) STIPULATION FOR
LEE ALLEN WOOLF, M.D.) SETTLEMENT
15 555 E. Tachevah, Suite 107)
Palm Springs, California 92262)
16)
Physician and Surgeon)
17 Certificate no. G014689)
18 Respondent.)
19

20 IT IS HEREBY STIPULATED AND AGREED by and between
21 the parties to the above-entitled matter that the following
22 allegations are true.

23 1. Kenneth J. Wagstaff, complainant herein and
24 Executive Director of the Board of Medical Quality Assurance
25 of the State of California, is represented by John K. Van de Kamp,
26 Attorney General of the State of California by Alan S. Meth,
27 Deputy Attorney General.

1 2. Lee Allen Woolf, M.D., (hereinafter "respondent")
2 has received, read and fully understands the accusation which is
3 presently on file and pending as Case No. D-3459 before the
4 Division of Medical Quality of the Board of Medical Quality
5 Assurance, State of California.

6 3. Respondent understands the nature of the charges
7 alleged in the above-mentioned accusation and that said charges
8 and allegations would constitute cause for imposing discipline
9 upon respondent's medical license heretofore issued by the Board
10 of Medical Quality Assurance.

11 4. Respondent is aware of each of respondent's rights,
12 including the right to a hearing on the charges and allegations,
13 the right to confront and cross-examine witnesses who would
14 testify against him, the right to present evidence in his favor
15 and call witnesses on his behalf, or to testify himself, his
16 right to contest the charges and allegations, and any other
17 rights which may be accorded to him pursuant to California
18 Administrative Procedure Act (Gov. Code § 11500, et seq.), his
19 right to reconsideration, review by the superior court and to
20 appeal to any other court; that respondent understands that in
21 signing this stipulation rather than contesting the accusation,
22 he is enabling the Division of Medical Quality of the Board of
23 Medical Quality Assurance to issue the following order from this
24 stipulation without further process.

25 5. Respondent freely and voluntarily waives each
26 and every one of the rights set forth hereinabove.

27 6. Respondent admits that he is suffering from a

1 mental illness, affective disorder, within the meaning of
2 Business and Professions Code section 822. This admission is
3 made for the purpose of this stipulation only, and in the event
4 this stipulation is not adopted by the Division of Medical
5 Quality, the admissions made herein shall be inadmissible in
6 any proceeding involving the parties to it.

7 6. Based on the foregoing stipulations and recitals,
8 it is stipulated and agreed that the Division of Medical Quality
9 may issue the following order as its decision in this case.

10 ORDER

11 IT IS HEREBY ORDERED that License Number G-14689
12 issued to Lee Allen Woolf, M.D. is revoked. However, said
13 revocation is stayed and respondent is placed on probation for
14 seven years on the following terms and conditions:

15 A. Within 30 days of the effective date of this
16 decision, respondent shall enroll in the Board's
17 diversion program and shall participate in said
18 program until such time as respondent has successfully
19 completed and is released from said program.

20 B. Within 30 days of the effective date of
21 this decision, and on a periodic basis thereafter
22 as may be required by the Division or its designee,
23 respondent shall undergo a psychiatric evaluation by
24 a Division-appointed psychiatrist who shall furnish a
25 psychiatric report to the Division or its designee.

26 C. Within 60 days of the effective date of
27 this decision, respondent shall submit to the Division

1 for its prior approval the name and qualifications
2 of a psychotherapist of respondent's choice. Upon
3 approval, respondent shall undergo and continue
4 treatment until the Division deems that no further
5 psychotherapy is necessary. Respondent shall have
6 the treating psychotherapist submit quarterly status
7 reports to the Division.

8 D. Respondent shall obey all federal, state
9 and local laws, and all rules governing the
10 practice of medicine in California.

11 E. Respondent shall submit quarterly
12 declarations under penalty of perjury on forms
13 provided by the Division, stating whether there has
14 been compliance with all the conditions of probation.

15 F. Respondent shall comply with the Division's
16 probation surveillance program.

17 G. Respondent shall appear in person for
18 interviews with the Division's medical consultant
19 upon request at various intervals and with
20 reasonable notice.

21 H. In the event respondent should leave
22 California to reside or to practice outside the
23 State, respondent must notify in writing the
24 Division of the dates of departure and return.
25 Periods of residency or practice outside California
26 will not apply to the reduction of this probationary
27 period.

1 I. Upon successful completion of probation,
2 respondent's certificate will be fully restored.


3 J. If respondent violates probation in any
4 respect the Division, after giving respondent
5 notice and the opportunity to be heard, may revoke
6 probation and carry out the disciplinary order that
7 was stayed. If an accusation or petition to revoke
8 probation is filed against respondent during
9 probation, the Division shall have continuing
10 jurisdiction until the matter is final, and the
11 period of probation shall be extended until the
12 matter is final.

13 K. Respondent shall not engage in the practice
14 of surgery until such time as the Division or its
15 designee grants respondent prior approval to engage
16 in the practice of surgery.

17 I concur in the stipulation and order.

18 DATED: January 5, 1987

19 JOHN K. VAN DE KAMP, Attorney General
20 of the State of California

21 
22 ALAN S. METH
23 Deputy Attorney General

24 Attorneys for Complainant
25 Board of Medical Quality Assurance
26 State of California
27

1 I have read the above stipulation fully. I understand
2 that by its terms I will be waiving certain rights accorded me
3 under California law. I also understand that by its terms the
4 Board of Medical Quality Assurance will issue a Decision
5 and Order on this stipulation whereby my license to practice
6 medicine will be subject to certain terms and conditions. I
7 agree to the above stipulation for settlement.

8 DATED: Lee Allen Woolf 10/27/86
9

10 Lee Allen Woolf
11 LEE ALLEN WOOLF, M.D.
12 Respondent

13 The foregoing is adopted as the decision of the
14 Division of Medical Quality of the Board of Medical Quality
15 Assurance in this matter and shall be effective on the 26th
16 day of February, 1987.

17 IT IS SO ORDERED this 27th day of January,
18 1987.

19
20 John W. Simmons
21 DIVISION OF MEDICAL QUALITY
22 BOARD OF MEDICAL QUALITY ASSURANCE
23 STATE OF CALIFORNIA
24 John W. Simmons
25 Secretary-Treasurer
26

27 ASM: jlr
10/3/86

1 JOHN K. VAN DE KAMP, Attorney General
of the State of California
2 ALAN S. METH,
Deputy Attorney General
3 110 West A Street, Suite 700
San Diego, California 92101
4 Telephone: (619) 237-7224

5 Attorneys for Complainant

6

7

BEFORE THE

8

DIVISION OF MEDICAL QUALITY

9

BOARD OF MEDICAL QUALITY ASSURANCE

10

DEPARTMENT OF CONSUMER AFFAIRS

11

STATE OF CALIFORNIA

12

13 In the Matter of the Accusation) NO. D-3459
against:)

14 LEE ALLEN WOOLF, M.D.) ACCUSATION
15 555 E. Tachevah, Suite 107)

16 Palm Springs, California 92262)

17 Physician and Surgeon)

18 Certificate No. G014689)

19 Respondent.)

20

Complainant Kenneth J. Wagstaff, alleges as follows:

21 1. He is the Executive Director of the Board of Medical
22 Quality Assurance of the State of California (hereafter "Board")
23 and makes and files this petition in his official capacity and
24 not otherwise.

25 2. At all times mentioned herein, Lee Allen Woolf, M.D.,
26 held Physician's and Surgeon's Certificate No. G014689 issued by
27 the Board. Said certificate is presently in full force and effect.

1 3. Section 822 of the Business and Professions Code
2 (hereafter, "Code") provides in pertinent part:

3 "If a licensing agency determines that its
4 licentiate's ability to practice his or her profession
5 safely is impaired because the licentiate is mentally
6 ill, or physically ill affecting competency, the
7 licensing agency may take action by any one of the
8 following menthods:

9 (a) Revoking the licentiate's certificate or
10 license.

11 (b) Suspending the licentiate's right to
12 practice.

13 (c) Placing the licentiate on probation.

14 (d) Taking such other action in relation to
15 the licentiate as the licensing agency in its
16 discretion deems proper...."

17 4. Section 825 of the Code provides that the
18 "licensing agency" referred to in section 822 of the Code means
19 the Division of Medical Quality of the Board (hereafter,
20 "Division").

21 5. Respondent is subject to action pursuant to
22 section 822 of the Code for the following reasons:

23 (a) On October 22, 1975, the Board adopted
24 the Proposed Decision of the Hearing Officer in the
25 case of In the Matter of the Accusation Against: Lee
26 Allen Woolf, M.D., No. D-1541, respondent herein. It
27 was found in this decision that respondent was mentally

1 ill within the meaning of Business and Professions Code
2 section 2417 (now section 822) and his condition was
3 diagnosed as cyclical manic -- depression. Respondent
4 was placed on probation for five years, and as a
5 condition of probation he was required to continue
6 under the care of Morton Kurland, M.D., or another
7 psychiatrist acceptable to this Board.

8 (b) On July 3, 1985, the Division issued an
9 Order pursuant to section 820 of the Code compelling
10 respondent to submit to a psychiatric examination.


11 (c) On September 26, 1985, respondent was
12 examined by Dr. Morton L. Kurland, M.D., a licensed
13 physician and surgeon specializing in psychiatry and
14 neurology. It is the opinion of Dr. Kurland that
15 respondent is mentally ill to the extent that
16 respondent's ability to practice medicine safely is
17 impaired.

18 WHEREFORE, complainant prays the Division hold a
19 hearing on the matters alleged herein, and following said hearing
20 issue a decision:

21 1. Revoking, suspending, or placing on probation,
22 Physician's and Surgeon's Certificate Number G014689 issued to
23 Lee Allen Woolf, and
24 /
25 /
26 /
27 /

1 2. Taking such other and further action as the
2 Division in its discretion deems proper.

3 DATED: January 30, 1986.

4
5
6 
7 KENNETH J. WAGSTAFF
8 Executive Director
9 Board of Medical Quality Assurance
10 Department of Consumer Affairs

11 Complainant
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27